

Exhibit L

United States District Court
District of New Jersey
Trenton Division

Andrew Ritz and Michael Ritz,

Plaintiffs,

v.

**Nissan-Infiniti LT; Trans Union,
LLC; Equifax Information
Services, LLC; and Experian
Information Solutions, Inc.,**

Defendants.

Case No. 3:20-cv-13509-FLW-DEA

**Responses to Nissan's First
Set of Interrogatories, Michael Ritz**

1. Identify the person answering these Interrogatories, all persons who assisted in the preparation of the answers, and state how each person participated in the preparation of the answers and identify their Social Security numbers.

Response: Plaintiff objects to this interrogatory on the grounds that it seeks information protected by the attorney client privilege and work product doctrine. Plaintiff objects to this request on the grounds that it is overly broad in that it seeks the social security number of Plaintiff's counsel. That information will not be provided. Subject to these objections, Plaintiff identifies the following persons: Michael Ritz and Guerino Cento.

2. State your full name (complete first name, middle name, and last name), nicknames, former names, and/or aliases which you have used and the

resolution from the credit agencies and Nissan.

My son and I have been Nissan customers for a long time. I have had satisfactory experiences with other dealerships and was quite angry at the way we were treated when we returned the leased car on August 9, 2020 and Nissan's false reporting of our payment history on our credit files.

4. Identification and Quantification of Damages

Pecuniary Damages: Plaintiff identifies, describes and quantifies the following pecuniary damages:¹⁰

Pecuniary Damages	Amount
Credit Denials	\$ 0.00
Lost Job Opportunities	\$ 0.00
Insurance Denials	\$ 0.00
Financial Loss	\$ 0.00
Delay in Obtaining Approval for Credit	\$ 5,000.00
Loss of Credit Opportunity	\$ 20,000.00
Out-Of-Pocket Expenses	\$ 500.00
Time Expended in Disputing Errors	\$ 500.00
	\$ 26,000.00

These itemizations are based upon information currently known and, therefore, are subject to change as discovery continues.

¹⁰ Amounts are based in part on prior relevant FCRA jury verdicts.

Non-Pecuniary Damages: Plaintiff identifies, describes and quantifies the following non-pecuniary damages:¹¹

Non-Pecuniary Damages	Amount
Loss of Sleep	\$ 7,500.00
Nervousness	\$ 7,500.00
Frustration	\$ 17,500.00
Mental Anguish Over Consumer Report	\$ 17,500.00
Injury to Reputation	\$ 5,000.00
Injury to Family Work and Sense of Well Being	\$ 7,500.00
Humiliation	\$ 7,500.00
Embarrassment	\$ 7,500.00
Mental Distress	\$ 15,000.00
Future Damages for Continuing Violation	\$ 7,500.00
	\$ 100,000.00

These itemizations are based upon information currently known and, therefore, are subject to change as discovery continues.

Punitive Damages: At trial Plaintiff intends to seek punitive damages for Nissan's willful violations in the amount of \$5 million dollars.¹²

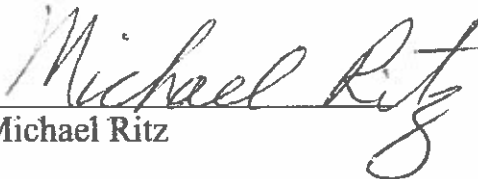
12. If you contend you have experienced any sort of physical, mental or emotional distress as the result of any alleged action or inaction of NMAC or any other person or entity, describe with particularity each symptom you

¹¹ Amounts are based in part on prior relevant FCRA jury verdicts.

¹² Amounts are based in part on prior relevant FCRA jury verdicts.

Verification

I, Michael Ritz, have read the foregoing interrogatories and the answers to those interrogatories, which are true according to the best of my knowledge, information and belief. I declare under penalty of perjury that the foregoing is true and correct.


Michael Ritz

/s/Guerino Cento
Guerino Cento
CENTO LAW
5666 Carrollton Avenue
Indianapolis, IN 46220
(317) 908-0678
cento@centolaw.com

